



Air Division 1, rr <airdivision1@deq.virginia.gov>

Public Comment: I Oppose the Buckingham Compressor Station Air Permit1 message

mwblalock@wm.edu <mwblalock@wm.edu>

Thu, Sep 20, 2018 at 4:37 PM

Reply-To: mwblalock@wm.edu

To: airdivision1@deq.virginia.gov

Dear Ms:

I'm writing today to urge the Air Pollution Control Board to reject the proposed permit for Dominion Energy's Buckingham Compressor Station.

This facility is a threat to our climate, public health and public safety, and the Board has an obligation to protect Virginians' clean air at all costs.

A vote to allow operation of this facility is a vote to expose residents of Union Hill to nearly 140 tons per year of harmful chemical emissions; it is a vote to increase climate disrupting greenhouse gas emissions at a time when Virginia is moving to decrease climate impacts from the power sector; and it is a vote to put Buckingham County in a blast zone.

Virginia doesn't need the Atlantic Coast Pipeline and we don't need this compressor station. I urge the Board to deny this and any future permits that come before you.

Sincerely,

Max Blalock
117 Braddock Road
Williamsburg, VA 23185-3203



Air Division 1, rr <airdivision1@deq.virginia.gov>

The ACP is safe and necessary

1 message

Joe Caracciolo <Joe.Caracciolo.56460856@p2a.co>

Thu, Sep 20, 2018 at 8:43 AM

Reply-To: joecara@hotmail.com

To: Ann Regn <airdivision1@deq.virginia.gov>

Dear Director Ann Regn,

Doing the right thing for our communities, our economy, and our environment is a balancing act. That's why a project as important as the Atlantic Coast Pipeline isn't built overnight. Rather, this project has gone through more than three years of careful planning and thorough scrutiny from agencies and organizations at every level.

Because of that exhaustive planning, the ACP is the safest way for us to get affordable, cleaner natural gas to those in our region who desperately need it.

The Buckingham Compressor Station is an integral part of the ACP project. The compressor station's "best in class" engineering design, and advanced emissions control equipment will ensure the facility will fully protect Virginia's air quality. In fact, modeling has demonstrated that the station's emissions, even when the facility is operating at its maximum, will not adversely impact Virginia's air quality. The modeling was conducted using methods approved by DEQ and has proven reliable thus far.

I believe that the stringency of the air quality permit that the ACP project has already passed will keep our community safe—while still allowing us to move forward with producing cleaner and more affordable American energy.

Accordingly, in the case of the recent discussions by the State Water Control Board regarding the state's use of the Army Corps of Engineers Nationwide Permit 12, I believe revisiting the existing process would be a mistake.

Our state's environment and our business climate have prospered from a consistent, predictable regulatory climate and from federal and state partnerships to allow scarce regulatory resources to be put to optimal use. There is no need to change the current approach.

Sincerely,

Joe Caracciolo

50 Ponderosa Ln

Palmyra, VA 22963

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Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

maggie castelli (maggie.castelli@richmond.edu) Sent You a Personal Message

Thu, Sep 20, 2018 at 1:26

<automail@knowwho.com>

PM

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.

- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.

- The draft permit will require mostly self-monitoring by Dominion of air quality and emissions. It does not explain why installing further community monitoring technology is unnecessary to protect air quality and human health.

- A Quantitative Risk Assessment and Comprehensive Health Impact Assessment should be conducted to address the complex and multifaceted ways that the health of residents could be impacted by emissions from the compressor station.

- No mention of how air quality emergencies will impact the community or be mitigated is included in the draft permit.

- While greenhouse gas emissions are briefly mentioned, there is no analysis of how measures established in the draft permit will ensure that air quality and human health will be protected from climate change impacts.

Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

maggie castelli
28 Westhampton Way
Richmond, VA 23173
maggie.castelli@richmond.edu
(719) 242-7381

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**Deny the Buckingham Compressor Station air permit**

1 message

Laura Douglass <Laura@yogapsychology.org>

Thu, Sep 20, 2018 at 11:01 PM

Reply-To: Laura@yogapsychology.org

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

I respectfully urge you to deny the draft minor source air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station.

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

We ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is self-defeating. With each new pipeline and compressor station built, significant amounts of methane are emitted into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide and, pound for pound, the comparative impacts of methane to carbon dioxide are 25 times greater over a 100 year period. Greenhouse gas emissions are mentioned in the draft air permit, but further analysis of impacts and plans to mitigate those emissions are necessary.
- ACP has not adequately addressed emergency response plans. Detailed plans should be drafted and shared with the community. These plans should outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station. At this time, there is no certainty that residents could be evacuated promptly, and Buckingham County emergency responders do not have the supplies or resources to respond to a significant industrial emergency.

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Laura Douglass
184 Boston ave
Somerville, MA 02144
6176233156



Deny the Buckingham Compressor Station air permit

1 message

peg futrell <futrellpeg@gmail.com>

Thu, Sep 20, 2018 at 9:17 AM

Reply-To: futrellpeg@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

Dear Director Paylor and members of the Air Pollution Control Board,

I urge you to deny the draft permit for the Atlantic Coast Pipeline's proposed 54,000 horsepower compressor station in Buckingham County.

This compressor station would endanger the community of Union Hill in Buckingham County, Virginia by emitting carbon monoxide, methane, nitrogen oxides, particulate matter, sulfur dioxide and volatile organic compounds into the air in close range to community homes.

It would ruin the atmosphere for us all. Now in this time of serious climate challenges, we must take more stringent measures to protect our air, climate and health, and envision power solutions that don't entail such a huge cost to the environment.

Please deny this permit and request that the following concerns be addressed:

- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is insufficient in ensuring compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is short-sighted and inappropriate. It has been demonstrated that each new pipeline and compressor station built, emits significant amounts of methane into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide thus methane has 25 times greater impact over a 100 year period. Further analysis of greenhouse gas emissions and impacts are required, along with plans to mitigate those emissions are necessary.
- ACP has not adequately addressed emergency response plans. Plans that outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station need to be detailed and made public. There is no certainty that residents could be evacuated promptly, nor that Buckingham County emergency responders have the supplies and resources to respond to a significant industrial emergency.

Please deny the permit for this compressor station.

Sincerely,
Peg Futrell

peg futrell
6963 gillis way
gainesville, VA 20155
7037538194



Air Division 1, rr <airdivision1@deq.virginia.gov>

Comments of IPAA in Support of Air Permit for Buckingham Compressor Station1 message

Susan Ginsberg <sginsberg@ipaa.org>

Thu, Sep 20, 2018 at 5:09 PM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

Attached are the comments of the Independent Petroleum Association of America in support of the air permit for Atlantic Coast Pipeline's Buckingham Compressor Station.

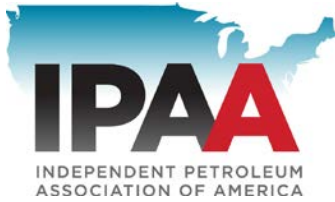
Thank you,

Susan Ginsberg

202-857-4728

Sent from [Mail](#) for Windows 10

 Atlantic Coast Pipeline air_VA DEQ.pdf
121K



September 20, 2018

Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23219

RE: Atlantic Coast Pipeline – Buckingham Compressor Station

The Independent Petroleum Association of America (“IPAA”) submits the following comments in support of the expeditious review and approval of the Department of Environmental Quality’s air permit for Atlantic Coast Pipeline’s Buckingham compressor station. IPAA spoke in support of issuance of the permit at the public meeting in Buckingham on September 11, 2018.

IPAA represents the thousands of companies that drill 95 percent of America's onshore and offshore oil and natural gas wells, including producers in Virginia. America’s independents produce 54 percent of American oil and produce 85 percent of American natural gas. IPAA members rely on a strong, safe network of pipelines to transport natural gas and its associated products to consumers. IPAA’s mission is to advocate for America’s exploration and production segment of the oil and natural gas industry. Our goal is to ensure that members can develop and produce energy, which requires a robust, safe transportation system to deliver that energy to market.

The United States is leading the world in natural gas production, producing 78.9 billion cubic feet per day in 2017. Even as natural gas production has increased, the United States has reduced its carbon footprint more than any other nation in the world. Energy-related carbon emissions in the United States hit a 25-year low in 2017, a fact that can be directly linked to increased natural gas use for power generation. Electricity generation has turned increasingly to natural gas as a preferred means of generating power, with benefits of reduced emissions, efficiency, a critical companion to increased reliance on renewable energy, and reduced costs to electricity consumers.

Owing to this increased use of clean, affordable natural gas, the United States is expanding its economy, creating new American manufacturing jobs, and protecting the environment by using energy more cleanly and efficiently than ever before. Today, as the world’s leading energy superpower, the United States is now in the unique position to export this clean, reliable energy source to our friends and allies and improve life for people and developing nations around the world.

IPAA members have encouraged this demand with technology that has tapped America’s abundant natural gas reserves, and they continue with efforts to meet this demand in a safe manner.

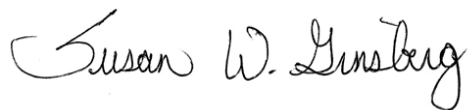
The Atlantic Coast Pipeline will promote the economic health and energy security of the Commonwealth while protecting the environment. The current interstate natural gas pipeline system is simply inadequate to serve the energy needs of Virginia and the entire Southeast. The abundant and economical supplies now being produced in the Appalachian Basin are virtually inaccessible in much of Virginia. These constraints have

hindered economic growth in much of the Commonwealth. Businesses thinking of expanding their operations or relocating here cannot be assured that they will have adequate access to the fuel.

The current pipeline system is also working against efforts by utilities in Virginia and elsewhere in the Southeast to make greater use of natural gas – an environmentally-friendly fuel with lower levels of emissions – for power generation. With the Atlantic Coast Pipeline in operation, that situation would change very quickly. Adequate and economical natural gas would be accessible to more power producers in our region. Atlantic Coast Pipeline's capacity would also provide much-needed backup to the increasing supplies of renewable, intermittent energy that Americans are demanding from their utilities.

Thank you for the opportunity to provide comments. With the growth in American energy production—and its attendant benefits in creating new jobs, providing consumers with affordable energy, lowering manufacturing costs, and improving air quality—comes the need for infrastructure to move the commodity to markets. The Atlantic Coast Pipeline creates an opportunity for the use of natural gas to generate needed electricity. As such, IPAA urges the Department to issue the air permit for the Buckingham compressor station.

Respectfully submitted,

A handwritten signature in black ink, reading "Susan W. Ginsberg". The signature is fluid and cursive, with the first name "Susan" being the most prominent.

Susan Ginsberg
Vice President
Crude Oil & Natural Gas Regulatory Affairs
202-857-4728



Air Division 1, rr <airdivision1@deq.virginia.gov>

Public Comment: I Oppose the Buckingham Compressor Station Air Permit1 message

elb5v@hotmail.com <elb5v@hotmail.com>

Thu, Sep 20, 2018 at 9:37 PM

Reply-To: elb5v@hotmail.com

To: airdivision1@deq.virginia.gov

Dear Ms:

I'm writing today to urge the Air Pollution Control Board to reject the proposed permit for Dominion Energy's Buckingham Compressor Station.

This facility is a threat to our climate, public health and public safety, and the Board has an obligation to protect Virginians' clean air at all costs.

A vote to allow operation of this facility is a vote to expose residents of Union Hill to nearly 140 tons per year of harmful chemical emissions; it is a vote to increase climate disrupting greenhouse gas emissions at a time when Virginia is moving to decrease climate impacts from the power sector; and it is a vote to put Buckingham County in a blast zone.

Virginia doesn't need the Atlantic Coast Pipeline and we don't need this compressor station. I urge the Board to deny this and any future permits that come before you.

Sincerely,

Erin Gulick
18705 Forestgrove Rd
Leesburg, VA 20175-9038

**Deny the Buckingham Compressor Station air permit**

1 message

Philip Justice <em4justice@gmail.com>

Thu, Sep 20, 2018 at 9:41 PM

Reply-To: em4justice@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

I respectfully urge you to deny the draft minor source air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station.

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

We ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is self-defeating. With each new pipeline and compressor station built, significant amounts of methane are emitted into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide and, pound for pound, the comparative impacts of methane to carbon dioxide are 25 times greater over a 100 year period. Greenhouse gas emissions are mentioned in the draft air permit, but further analysis of impacts and plans to mitigate those emissions are necessary.
- ACP has not adequately addressed emergency response plans. Detailed plans should be drafted and shared with the community. These plans should outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station. At this time, there is no certainty that residents could be evacuated promptly, and Buckingham County emergency responders do not have the supplies or resources to respond to a significant industrial emergency.

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Philip Justice
296 Gullysville Ln
Faber, VA 22938
4349961663



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station

1 message

Bridget Kelley-Dearing <bridgetzlm@aol.com>

Thu, Sep 20, 2018 at 11:21 PM

To: airdivision1@deq.virginia.gov

Cc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

I am writing because I am concerned about the air and noise pollution that the marginalized minority community in Buckingham County are facing with the proposed Atlantic Coast Pipeline compressor station.

A 30-day comment period for the air permit for Union Hill Compressor Station in Buckingham is inadequate. Even the extension to September 21st isn't long enough for community members to understand, research and comment on the large amount of documents received just weeks before the comment period, especially considering they didn't receive any real technical support from state agencies. The recent informational meeting (August 16) with DEQ Air Division was absolutely NOT sufficient for citizens to grasp the many technical aspects of the application and therefore limited the questions they were not prepared to ask. Dominion Energy has had many months to work with their technical experts and consult with the DEQ Air Division expertise. The citizens in Buckingham County deserve equal time.

Access to online documents for Buckingham County community members is difficult if not prohibitive. Many people in this community do not own a computer and aren't familiar with Internet use. Even if you do have access and understand how to use the Internet, connectivity is unreliable here. Buckingham lacks rural wifi or broadband infrastructure.

The language of the hundreds of pages of air permitting documents and reports make them impossible to understand without technical support. Friends of Buckingham County has recently identified experts who will work with residents to help them understand the technical documents so they may properly understand them. Many residents are not convinced that their health and welfare will be adequately protected by the current modeling, monitoring and compliance, especially as Dominion's compliance record has proven to be faulty with other projects. Therefore, I respectfully request an additional 30 days for a total comment period of 60 days. Thank you for considering my request.

Sincerely,

Bridget Kelley-Dearing

626 Stonewall Street
Lexington, Virginia 24450

bridgetzlm@aol.com
(540) 463-5113

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station

1 message

Bridget Kelley-Dearing <bridgetzlm@aol.com>

Thu, Sep 20, 2018 at 11:26 PM

To: airdivision1@deq.virginia.govCc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

The Department of Environmental Quality should immediately complete a Quantified Risk Assessment (QRA) for the Buckingham Compressor Station prior to permitting and to work with other state agencies to conduct a Health Risk Assessment (HRA) and a Health Impact Assessment (HRI).

Bridget Kelley-Dearing
[626 Stonewall Street](#)
Lexington, Virginia 24450

bridgetzlm@aol.com
(540) 463-5113

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham County Compressor Station

1 message

Bridget Kelley-Dearing <bridgetzlm@aol.com>

Thu, Sep 20, 2018 at 11:53 PM

To: airdivision1@deq.virginia.govCc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

The air permit treatment of Particulate Matter impacts in particular, but also of health impacts from compressors in general, is inadequate

Particulate matter is known to impair lung function, aggravate asthma, cause high blood pressure and heart attack. Particulate matter can adhere with other compounds and then can carry these compounds, which may be toxic, into the deep lung and this is a health concern near compressor stations where multiple toxins are emitted with particulate matter.

Why is DEQ not adequately considering particulate matter, which will also be produced during the construction period, as well as daily during operations of Buckingham Compressor Station?

Given that particulate matter causes respiratory damage and there are technologies available to scrub PM from air emissions, how can
Dominion claim best available technology if they are not scrubbing particulate matter?

Bridget Kelley-Dearing
[626 Stonewall Street](#)
[Lexington, Virginia 24450](#)

bridgetzlm@aol.com
(540) 460-0535

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station1 message

Bridget Kelley-Dearing <bridgetzlm@aol.com>

Thu, Sep 20, 2018 at 11:58 PM

To: airdivision1@deq.virginia.govCc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

1 Health risks from relevant air contaminants receive inadequate treatment.

From studies of compressor stations that "met" NAAQ standards, the following problems were notated: health impacts from hydrogen sulfide, PM2.5 or carbonyls.

Hydrogen sulfide was monitored continuously, documenting the variability of potential exposures, along with the average. Spikes of H2S were quite high. Southwest Pennsylvania Environmental Health Study (SWP-EHP) has similar findings from measurements of PM2.5 near compressor stations. Particulate matter is not included in DEQ concerns, yet must be.

There are other levels and types exposure around compressor stations that raise health concerns. In particular, acetaldehyde, benzene, formaldehyde, carbon tetrachloride, chloroform, 1,2-DCA and 1,1,2-trichloroethane, crotonaldehyde, and 1-methoxy-2-propanone exceeded their respective comparison values (CVs).

Mixtures of pollutants are a critically important topic in addressing the public health implications of compressor stations. In fact, a very large number of chemicals are released together. NAAQ and Medical reference values are not able to take the complex nature of the shale environment, its multiple emissions and interactions into full consideration. Some mixtures like particular matter (PM) and volatile organic compounds (VOC) act synergistically to increase the toxicity of the chemicals.

Bridget Kelley-Dearing
[626 Stonewall Street](#)
[Lexington, Virginia 24450](#)

bridgetzlm@aol.com
(540) 463-5113



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Neelamberi Klein (neela.klein@gmail.com) Sent You a Personal Message

Thu, Sep 20, 2018 at 12:12 PM

<automail@knowwho.com>

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.

- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.

- The draft permit will require mostly self-monitoring by Dominion of air quality and emissions. It does not explain why installing further community monitoring technology is unnecessary to protect air quality and human health.

- A Quantitative Risk Assessment and Comprehensive Health Impact Assessment should be conducted to address the complex and multifaceted ways that the health of residents could be impacted by emissions from the compressor station.

- No mention of how air quality emergencies will impact the community or be mitigated is included in the draft permit.

- While greenhouse gas emissions are briefly mentioned, there is no analysis of how measures established in the draft permit will ensure that air quality and human health will be protected from climate change impacts.

Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Neelamberi Klein
UR 2083 28 Westhampton Way
University of Richmond, VA 23173
neela.klein@gmail.com
(267) 664-0800

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



Air Division 1, rr <airdivision1@deq.virginia.gov>

Fwd: Buckingham Compressor Station Docket #21599 Attention Ann Regn1 message

Eleanor Labiosa <boppinbamma@att.net>

Thu, Sep 20, 2018 at 11:26 PM

To: Department of Environmental Quality <airdivision1@deq.virginia.gov>

Sent from my iPhone

Begin forwarded message:

From: Eleanor Labiosa <boppinbamma@att.net>**Date:** September 20, 2018 at 8:38:19 PM EDT**To:** Augusta County Alliance <lotswife@comcast.net>**Subject:** Buckingham Compressor Station Docket #21599 Attention Ann Regn

Dear M Ann Regn,

The location chosen for every compressor station necessary for Dominion's pipeline project is obviously based on a community's ability to resist. Their Buckingham County target is a pitiful insult to people who will be trapped with no defense against the noise and toxins they cannot escape. This is blatant discrimination which is illegal.

A totally fair placement for every compressor station and work yard necessary for Dominion's pipelines would be in the communities inhabited by those who will reap the profits of these pipelines that nobody else wants.

Everyone involved in granting these permits should at least visit an active site to qualify themselves for the privilege of sentencing other human beings to endure the consequences of such a decision for life.

Thank you for seriously weighing this matter.

Sincerely, Eleanor Labiosa

500 C Street Apt 215

Staunton, Virginia. 24401

281-253-1186

Sent from my iPhone



Deny the Buckingham Compressor Station air permit

1 message

Tara Lipscombe <Toralipscombe@gmail.com>

Thu, Sep 20, 2018 at 10:09 PM

Reply-To: Taralipscombe@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

I respectfully urge you to deny the draft minor source air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station.

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

We ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is self-defeating. With each new pipeline and compressor station built, significant amounts of methane are emitted into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide and, pound for pound, the comparative impacts of methane to carbon dioxide are 25 times greater over a 100 year period. Greenhouse gas emissions are mentioned in the draft air permit, but further analysis of impacts and plans to mitigate those emissions are necessary.
- ACP has not adequately addressed emergency response plans. Detailed plans should be drafted and shared with the community. These plans should outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station. At this time, there is no certainty that residents could be evacuated promptly, and Buckingham County emergency responders do not have the supplies or resources to respond to a significant industrial emergency.

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Tara Lipscombe
Abe White Lane
New Canton, VA 23123
9414055406



Buckingham Compressor Station Air Permit Comment

1 message

Shane Lovelace <lovelacesn@gmail.com>

Thu, Sep 20, 2018 at 10:20 PM

To: airdivision1@deq.virginia.gov, michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

I am a process engineer that has been working in the field for over 10 years. I have a good understanding of typical engineering practices as it pertains to engineering calculations and process review. I, along with my partner who is also a chemical engineer, have completed multiple in-depth reviews of the ACP Buckingham Compressor Station Air Modeling report, and engineering review as well as the permit calculation spreadsheet. Our thorough review produced many concerns, including the following:

My largest concern involving this compressor station is how inconsistent and ineffective the emission controls will be. Specifically, not only will the emission controls not work below 0 degrees Fahrenheit (F) per the turbine manufacturers themselves, but the emission levels will increase above normal uncontrolled emission rates to ensure stable combustion at these low temperatures. The Northampton engineering review even states, "At low loads and temperatures below 0 degrees F, uncontrolled emissions are much higher: NOx would be 13x higher, CO would be 6x higher, and VOC would be 2x higher." The Buckingham permit only accounts for 5 hours of subzero temperature operation per year- how much higher do they state the emissions will be? The permit assumes this will be a rare occurrence by only looking at data from 2012-2016, in which only 5 hours of subzero temperatures were recorded in 2015. What they fail to mention is the fact that there were also instances of subzero temperatures in both 2017 and 2018. This information provides a clear indication that we should expect these subzero events to become more frequent and probably more intense. They also failed to investigate if wind speeds and wind chill factors will add to cause increased emissions during colder periods by destabilizing combustion as seen with the sub-zero temperatures.

Additionally, the permit does not account for the Bermuda High that affects Virginia each summer, causing extended periods of heat and humidity that leave the air stagnant and make the dilution of emissions much slower. The permit models should address the seasonally extended residence times of pollutants in the community's air.

There is no mention of a standard maintenance plan or equipment review process to make sure the emission control equipment is functioning correctly and consistently. If these emission controls fail for any reason, emission levels will increase. NOx will potentially increase by 58%, CO will potentially increase by 92% and VOCs will potentially increase by 50%. There should also be continuous emission monitors to ensure the emission controls are working efficiently and the station is complying with all emission limits at all times. The testing mentioned in the permit is inadequate to protect the community from short-term exposures because it masks short-term events. More importantly, the regional air standards are not adequate to protect a community from close-range, dangerously high emission events. The permit does not address the necessity of short-term limits.

DEQ currently proposed reduction in Nitrogen Oxide emissions is 58%, reduction in Carbon Monoxide is 92% and reduction in VOCs is 50%. Can DEQ provide proof they are controlling emissions at these efficiencies? Permits for the West Virginia and North Carolina compressor stations state lower levels of emission controls for the same type of turbines.

The permit only presents annual emission values and does not look in-depth at possible 1 hour emissions or whether the compressor station could potentially surpass these limits.

The compressor station will also be equipped with a backup power generator which is powered using gas from the pipeline. The model only considers generator emissions for 500 hours a year. Considering the rural location of this compressor station and the increasing storm intensities we've been experiencing, it is likely this generator will have to run more often than has been considered. The annual estimated emission of CO produced by the generator is 2.4 tons/yr (for only 500 hours) while CT-04 is estimated to produce 2.37 tons/yr of CO (for 8,722 hours). What happens if there is an extended power outage in sub-zero temperatures, which is not an uncommon situation during snow or ice

events? The generator will produce high levels of CO in addition to CT-01 thru CT-04 with no emission controls active. These emissions will potentially surpass the NAAQS limits of 10,000 ug/m³ for the 8 hour average or the 40,000 ug/m³ for the 1 hour average.

All of the turbine manufacturers emission estimates were assumed to be at sea level, 4"/4" inlet/outlet losses and nominal performance. The 590ft above sea-level elevation of the compressor station site was not taken into account when modeling for the air permit.

Further, the human population value that Dominion used in the air permit is also grossly underestimated. They used an average across the county rather than the much denser population in Union Hill, which is the actual location of the compressor station. This is something that has been mentioned already to the DEQ before, and yet still goes unaddressed.

This air permit is woefully inadequate for protecting air quality from the monstrous compressor station slated for Union Hill, and it is obvious that the DEQ and the State Air Board must deny the permit. Additionally, under the Title VI of the Civil Rights Act, the DEQ is required to prevent discrimination in the placing of polluting infrastructure. It is now well-documented that racial and economic targeting were used in the placement of the Atlantic Coast pipeline and it's compressor station slated to devastate the Union Hill community. The community also was not given enough time to comment on the air permit, and a 30-day extension should be granted immediately. The original extension was far too short. The DEQ should immediately complete a Quantified Risk Assessment (QRA) for the compressor station prior to permitting and to work with other state agencies to conduct a Health Risk Assessment (HRA) and a Health Impact Assessment (HRI) – this will surely prove it cannot be constructed without detrimental consequences to the health of the surrounding community. And, again, the compressor station's permit should be ultimately denied – anything less defies science and justice. There are no benefits to the Atlantic Coast pipeline, and it will do nothing but destroy and harm the communities it passes through.

Shane Lovelace



Buckingham Compressor Station Air Permit Comment

1 message

Stacy Lovelace <johnsonsc3@gmail.com>

Thu, Sep 20, 2018 at 10:19 PM

To: airdivision1@deq.virginia.gov, michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

I am a chemical engineer that has been working in the field for over 10 years. I have a good understanding of typical engineering practices as it pertains to engineering calculations and review. I, along with my partner who is also a process engineer, have completed multiple in-depth reviews of the ACP Buckingham Compressor Station Air Modeling report, and engineering review as well as the permit calculation spreadsheet. Our thorough review produced many concerns, including the following:

A major concern involving this compressor station is how inconsistent and ineffective the emission controls will be. Specifically, not only will the emission controls not work below 0 degrees Fahrenheit (F) per the turbine manufacturers themselves, but the emission levels will increase above normal uncontrolled emission rates to ensure stable combustion at these low temperatures. The Northampton engineering review even states, "At low loads and temperatures below 0 degrees F, uncontrolled emissions are much higher: NOx would be 13x higher, CO would be 6x higher, and VOC would be 2x higher." The Buckingham permit only accounts for 5 hours of subzero temperature operation per year- how much higher do they state the emissions will be? The permit assumes this will be a rare occurrence by only looking at data from 2012-2016, in which only 5 hours of subzero temperatures were recorded in 2015. What they fail to mention is the fact that there were also instances of subzero temperatures in both 2017 and 2018. This information provides a clear indication that we should expect these subzero events to become more frequent and probably more intense. They also failed to investigate if wind speeds and wind chill factors will add to cause increased emissions during colder periods by destabilizing combustion as seen with the sub-zero temperatures.

Additionally, the permit does not account for the Bermuda High that affects Virginia each summer, causing extended periods of heat and humidity that leave the air stagnant and make the dilution of emissions much slower. The permit models should address the seasonally extended residence times of pollutants in the community's air.

There is no mention of a standard maintenance plan or equipment review process to make sure the emission control equipment is functioning correctly and consistently. If these emission controls fail for any reason, emission levels will increase. NOx will potentially increase by 58%, CO will potentially increase by 92% and VOCs will potentially increase by 50%. There should also be continuous emission monitors to ensure the emission controls are working efficiently and the station is complying with all emission limits at all times. The testing mentioned in the permit is inadequate to protect the community from short-term exposures because it masks short-term events. More importantly, the regional air standards are not adequate to protect a community from close-range, dangerously high emission events. The permit does not address the necessity of short-term limits.

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The permit only presents annual emission values and does not look in-depth at possible 1 hour emissions or whether the compressor station could potentially surpass these limits.

The compressor station will also be equipped with a backup power generator which is powered using gas from the pipeline. The model only considers generator emissions for 500 hours a year. Considering the rural location of this compressor station and the increasing storm intensities we've been experiencing, it is likely this generator will have to run more often than has been considered. The annual estimated emission of CO produced by the generator is 2.4 tons/yr (for only 500 hours) while CT-04 is estimated to produce 2.37 tons/yr of CO (for 8,722 hours). What happens if there is an extended power outage in sub-zero temperatures, which is not an uncommon situation during snow or ice events? The generator will produce high levels of CO in addition to CT-01 thru CT-04 with no emission controls active. These emissions will potentially surpass the NAAQS limits of 10,000 ug/m³ for the 8 hour average or the 40,000 ug/m³ for the 1 hour average.

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Stacy Lovelace



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station permit

1 message

McGeary, William S <smcgeary@washgas.com>

Thu, Sep 20, 2018 at 2:58 PM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

I write in strong support of Dominion Energy's application for the Buckingham Compressor Station. Required for natural gas to flow through the Atlantic Coast Pipeline, the project protects Virginia's air quality, and its features include advanced emissions equipment.

It is my understanding that the Department of Environmental Quality's draft air quality permit for this facility has the strongest emission limits of any natural gas compressor stations located in air quality attainment areas in the Commonwealth, meeting all national air quality standards.

Using modeling methods approved by DEQ, it is clear that emissions will be well below state and federal standards created to protect human health.

Impressive as well are the facility's turbine design with modern, clean-burning technology, limiting nitrogen oxide discharge. Methane emissions can be minimized, with the ability to lower line pressure, and close main and unit valves.

Dominion is also to be commended for engaging so extensively with Buckingham County's government and residents. Thoughtfully addressing community concerns, the company accepted 41 conditions

to the Special Use Permit, approved by the locality's Planning Commission and Board of Supervisors.

For each of these good reasons, approval of the draft permit is urged. Thank you for your consideration.

W. SCOTT MCGEARY

Director, State Public Policy

Washington Gas | A WGL Company

P 202-624-6686 | M 703-408-6583 | smcgeary@washgas.com

Note New Address: 1000 Maine Avenue, SW, Washington, DC 20024

ENERGY ANSWERS. ASK US.

WashingtonGas.com   

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Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station

1 message

Floyd Miller <fmiller@thembl.com>
To: airdivision1@deq.virginia.gov

Thu, Sep 20, 2018 at 11:19 AM

Please see the attached letter for your perusal and submission!

Regards,

Floyd E. Miller II, M. Ed.

President & CEO

METROPOLITAN BUSINESS LEAGUE

Mailing | P.O. Box 26751

Richmond, VA 23261-6751

Physical | 707 E. Main Street, Suite 1615

Richmond, VA 23219

804.649.7473 ph

804.339.9972 cell

fmiller@thembl.org

www.thembl.org

**Buckingham Compressor Station Letter.pdf**

98K



Guide. Connect. Succeed.

September 19, 2018

Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

RE: Buckingham Compressor Station

Dear Department of Environmental Quality:

On behalf of the Metropolitan Business League (MBL), I appreciate this opportunity to submit our comments on the draft air quality permit for the Buckingham Compressor Station. As you know, the station is an integral part of the Atlantic Coast Pipeline, and the MBL, along with many other members of the Commonwealth's business community, have strongly supported the project. We believe our state's continued economic health and growth depends upon a secure, reliable and affordable supply of energy. The pipeline is a key to achieving that goal.

However, the MBL could not support the project, no matter how attractive it might be from an energy standpoint, if we felt it had the potential to damage Virginia's environment. Fortunately, we have no such concerns. We are impressed by the developers' commitment to protecting our natural resources. We are equally impressed with the thoroughness and dedication your department has brought to reviewing the ACP's environmental impacts and your willingness to take strong steps to ensure those impacts are held to an absolute minimum. You have shown that same dedication in developing the draft air permit.

We are very pleased with the strict emissions limits included in the draft. Although the station is classified under federal and state regulations as a "minor" source of emissions, we are told that the limits included in the draft permit are much more typical of those imposed on larger facilities with much higher emissions levels. In fact, we understand that the limits in the draft Buckingham permit are four to 10 times stricter than the limits in any other permit recently issued for compressor stations in Virginia.

These stringent limits apply to regulated emissions ranging from nitrogen oxides to volatile organic compounds to carbon monoxide, and they will help ensure that Virginia's air remains clean and healthy even as we expand our energy infrastructure.



Guide. Connect. Succeed.

Additionally, we are impressed by the control technology required by the draft permit. Here again, these controls are more typical of those mandated for much larger facilities with higher levels of emissions. The systems included in the draft permit cover an impressive range from selective catalytic reduction to as vent gas recovery system designed to minimize the release of natural gas into the atmosphere. We are confident that the developers will carry out the permit's strong requirements for air quality protection.

The Department of Environmental Quality has worked hard for many years to ensure that future generations of Virginians will have clean water and air. We applaud you for continuing that work through the terms and conditions in the draft Buckingham air permit.

Again, thank you for the opportunity to offer our comments on this important regulatory matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Floyd E. Miller, II", is written over a light blue horizontal line.

Floyd E. Miller, II M. Ed.
President & CEO



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit1 message

Melissa Ooten (mooten@richmond.edu) Sent You a Personal Message

Thu, Sep 20, 2018 at 12:10 PM

<automail@knowwho.com>

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.

- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.

- The draft permit will require mostly self-monitoring by Dominion of air quality and emissions. It does not explain why installing further community monitoring technology is unnecessary to protect air quality and human health.

- A Quantitative Risk Assessment and Comprehensive Health Impact Assessment should be conducted to address the complex and multifaceted ways that the health of residents could be impacted by emissions from the compressor station.

- No mention of how air quality emergencies will impact the community or be mitigated is included in the draft permit.

- While greenhouse gas emissions are briefly mentioned, there is no analysis of how measures established in the draft permit will ensure that air quality and human health will be protected from climate change impacts.

Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Melissa Ooten
2112 Lennox Rd
Henrico, VA 23228
mooten@richmond.edu
(804) 301-1571

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Otis Pauley (otis.paul@hotmail.com) Sent You a Personal Message

Thu, Sep 20, 2018 at 12:51

<automail@knowwho.com>

AM

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

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- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.

- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.

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Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Otis Pauley
4340 Plantation Road, NE Apt. 6
Roanoke, VA 24012
otis.paul@hotmail.com
(540) 915-5744

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Mysia Perry (mysia.perry@richmond.edu) Sent You a Personal Message

Thu, Sep 20, 2018 at 12:35

<automail@knowwho.com>

PM

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

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Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Mysia Perry
410 Westhampton Way, UR 0408
Richmond, VA 23173
mysia.perry@richmond.edu
(804) 269-1307

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Public Comment: I Oppose the Buckingham Compressor Station Air Permit

1 message

Crystal Polk <mailagent@thesoftedge.com>
Reply-To: crystaltheball@yahoo.com
To: airdivision1@deq.virginia.gov

Thu, Sep 20, 2018 at 9:00 AM

Dear Ms:

I'm writing today to urge the Air Pollution Control Board to reject the proposed permit for Dominion Energy's Buckingham Compressor Station.

This facility is a threat to our climate, public health and public safety, and the Board has an obligation to protect Virginians' clean air at all costs.

A vote to allow operation of this facility is a vote to expose residents of Union Hill to nearly 140 tons per year of harmful chemical emissions; it is a vote to increase climate disrupting greenhouse gas emissions at a time when Virginia is moving to decrease climate impacts from the power sector; and it is a vote to put Buckingham County in a blast zone.

Virginia doesn't need the Atlantic Coast Pipeline and we don't need this compressor station. I urge the Board to deny this and any future permits that come before you.

Sincerely,

Crystal Polk
9220 Sprucewood Rd
Burke, VA 22015-3557



Air Division 1, rr <airdivision1@deq.virginia.gov>

Comment Period Submission Regarding the BCS Air Permit

1 message

Tina Rockett <rokt@icloud.com>
To: airdivision1@deq.virginia.gov
Cc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

Thu, Sep 20, 2018 at 2:52 PM

To Whom It May Concern:

I am writing today to ask for 1) a 30 day extension of the comment period regarding the air permit for the proposed Buckingham compressor station and 2) for the Department of Environmental Quality to immediately complete a Quantified Risk Assessment for the Buckingham Compressor Station prior to permitting and to work with other state agencies to conduct a Health Risk Assessment and a Health Impact Assessment.

But in reality, these measures should not be necessary because the ACP and BCS are disastrous for our environment and climate and completely unnecessary as evidenced below:

According to studies, environmental scientists and pipeline experts who are not on the Dominion Energy payroll, we currently have enough *existing* pipelines and gas/fossil fuel supplies to transition any future energy needs to renewable sources making the ACP unnecessary.

Southern Environmental Law Center: https://www.southernenvironment.org/uploads/words_docs/Synapse_Report_FINAL_FINAL.pdf

A vision for the transition to 100% wind, water & solar energy in Virginia: <http://thesolutionsproject.org/why-clean-energy/>

Further, it has already become evident that the ACP cannot be built safely with massive mudslides into our waterways and impacts to vulnerable animal and insect species along its path for which permits from the U.S. Fish and Wildlife Service as well as the National Park Service have been vacated. And although these have been 'resolved' there are more challenges in the courts.

<https://www.sierraclub.org/press-releases/2018/08/federal-court-throws-out-another-key-acp-permit>

<https://www.gettingmoreontheground.com/2018/08/05/deny-401-certification-for-the-acp/>

Add to that, Governor Northam's own Advisory Council on Environmental Justice has called for an immediate halt to the ACP and MVP citing disproportionate impacts for people of color and for low-income populations - also known as environmental racism. A prime example is the Buckingham Compressor Station.

<http://richmond2day.com/northams-advisory-council-on-environmental-justice-calls-for-stay-on-all-further-permits-for-pipelines/>

Virginia is rich in solar, wind and water resources.

The ACP cost has been estimated at ~ \$6.1 Billion and ~ \$9 Billion in total including the MVP, and these costs do not even count the Buckingham Compressor Station or a Chesapeake Southside Connector. Instead of using billions of our tax dollars to build unnecessary, harmful fracked gas infrastructure, Virginia should be using that money for mitigation of flooding, transitioning to renewable energy and monetarily supporting and training our fossil fuel workers for healthier clean energy jobs.

<http://wvmetronews.com/2017/10/13/atlantic-coast-and-mountain-valley-pipelines-gain-federal-approval/>

There are many more reasons to stop the BCS and ACP that I could cite, but it should be more than enough that neither of these are needed and the future (if we are to have one for our children) is renewable energy.

9/28/2018

Commonwealth of Virginia Mail - Comment Period Submission Regarding the BCS Air Permit

Bottom line, The DEQ, FERC and Gov. Northam should immediately stop the Atlantic Coast Pipeline and the Buckingham Compressor Station.

I believe the very least the DEQ could do is extend the comment period and complete a QRA, HRA and HRI.

**Sincerely,
Tina Rockett
Virginia resident**

Sent from my iPhone



Air Division 1, rr <airdivision1@deq.virginia.gov>

Extend Comment Period for the Buckingham Compressor Air Permit

1 message

Aida Schimmel <adamarisch670@gmail.com>

Thu, Sep 20, 2018 at 11:57 PM

Reply-To: adamarisch670@gmail.com

To: airdivision1@deq.virginia.gov

The concept of "tzedek" comes from the Jewish faith tradition, calling for justice and equity among all people. The vision of tzedek is one of environmental justice and clean and safe air for all to breathe. The proposed Atlantic Coast Pipeline (ACP) compressor station violates this concept as it would expose residents in Union Hill and Buckingham County to leaking pollutants such as methane gas, formaldehyde, benzene, arsenic, uranium and additional toxic volatile organic compounds (VOCs).

This 54,000+ horsepower compressor station is one of the largest that Dominion has ever built and the largest in Virginia, further endangering health of residents and increasing risk and vulnerability. Having clean air is a fundamental human right and is especially vital for children and the elderly, some of the most vulnerable to the negative impacts of inhaling pollutants.

Many of the world's major faith traditions have a mandate to care for the Earth. By doing so, we care for each other. I submit this comment with love to express my solidarity with the community of Buckingham and their health and safety concerns stemming from the construction and operation of this massive compressor station.

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to extend the 30-day comment period to at least 60 days, to ensure meaningful participation by impacted populations in permitting and monitoring, and to immediately complete a thorough Quantitative Risk Assessment (QRA) and a Comprehensive Health Impact Assessment (CHIA) prior to any future permitting.

I further urge the VA State Air Pollution Control Board and the DEQ to abide by the principles of environmental justice as the compressor station is proposed to be sited in Buckingham County's historic Union Hill, an 85% African American community. It is unacceptable that our society continues to disproportionately burden the poor and people of color with increased levels of dangerous air pollution.

Being unable to take a deep breath of clean air to pray or meditate at the many nearby religious sites such as Union Hill and Union Grove Churches and the LOTUS Temple, one of the many sacred places in Satchidananda Ashram Yogaville, is an egregious violation of humanity.

The risks to our sacred gift of air posed by Dominion's proposed ACP compressor station are simply too high. This historically black community deserves to be recognized and respected, not disregarded as a place of little concern. The people in this community will be exposed to toxic emissions that will impact their health. In May of 2016 Preservation Virginia listed Union Hill as one of Virginia's "Most Endangered Historic Places" and the danger they identified was the ACP. Dominion first sought approval of the compressor station on national forest land but the U.S. Forest Service said it was too much of a threat to wildlife. That is good. It is too much of a threat to people also. The ACP should not be going through any areas of VA. Perhaps if the pipeline and the other industry that accompanies it had to be built through the communities of millionaires and billionaires Dominion would not be so eager, or even allowed, to engage in this destructive enterprise.

Ms. Aida Schimmel
cottonwood ct
Virginia Beach, VA 23462
(555)555-5555



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Elizabeth Schultz (elizabethschultz9@gmail.com) Sent You a Personal Message

Thu, Sep 20, 2018 at 1:19

<automail@knowwho.com>

PM

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.

- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.

- The draft permit will require mostly self-monitoring by Dominion of air quality and emissions. It does not explain why installing further community monitoring technology is unnecessary to protect air quality and human health.

- A Quantitative Risk Assessment and Comprehensive Health Impact Assessment should be conducted to address the complex and multifaceted ways that the health of residents could be impacted by emissions from the compressor station.

- No mention of how air quality emergencies will impact the community or be mitigated is included in the draft permit.

- While greenhouse gas emissions are briefly mentioned, there is no analysis of how measures established in the draft permit will ensure that air quality and human health will be protected from climate change impacts.

Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Elizabeth Schultz
28 Westhampton Way UR 2051
richmond, VA 23173
elizabethschultz9@gmail.com
(618) 713-5438

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Kate Sjovold (kate.sjovold@richmond.edu) Sent You a Personal Message

Thu, Sep 20, 2018 at 1:56

<automail@knowwho.com>

PM

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

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Sincerely,

Kate Sjovold
28 Westhampton Way
Richmond, VA 23229
kate.sjovold@richmond.edu
(804) 389-3559

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**Deny the Buckingham Compressor Station air permit**

1 message

Anna Smith <Burnleyfarm@gmail.com>

Thu, Sep 20, 2018 at 11:44 AM

Reply-To: Burnleyfarm@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

I respectfully urge you to deny the draft minor source air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station.

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

We ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is self-defeating. With each new pipeline and compressor station built, significant amounts of methane are emitted into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide and, pound for pound, the comparative impacts of methane to carbon dioxide are 25 times greater over a 100 year period. Greenhouse gas emissions are mentioned in the draft air permit, but further analysis of impacts and plans to mitigate those emissions are necessary.
- ACP has not adequately addressed emergency response plans. Detailed plans should be drafted and shared with the community. These plans should outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station. At this time, there is no certainty that residents could be evacuated promptly, and Buckingham County emergency responders do not have the supplies or resources to respond to a significant industrial emergency.

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Anna Smith
Burnley Lane
KG, VA 22485
5406428026

Air Division 1, rr <airdivision1@deq.virginia.gov>

Deny the Buckingham Compressor Station air permit

1 message

Anna Smith <Burnleyfarm@gmail.com>

Thu, Sep 20, 2018 at 11:44 AM

Reply-To: Burnleyfarm@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
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9/25/2018

Commonwealth of Virginia Mail - Deny the Buckingham Compressor Station air permit

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Anna Smith
Burnley Lane
KG, VA 22485
5406428026



Air Division 1, rr <airdivision1@deq.virginia.gov>

Air Pollution Permit Comments for Buckingham Compressor Station

1 message

Chris Sonne <1civilengr@gmail.com>

Thu, Sep 20, 2018 at 2:22 PM

To: airdivision1@deq.virginia.gov

Cc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov, priscillasonne@gmail.com

I have attached my comments regarding the above referenced permit application.

I look forward to your response.

Thank You,

Christopher Sonne, P.E.



DEQ Air Permits.pdf

28K

Christopher & Priscilla Sonne
191 Satinwood Lane
Nellysford, VA 22958

September 20, 2018

Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Rd.
Glen Allen, VA 23060
via email

RE: Comments for Virginia Air Pollution Control Board regarding the Air Permit
for proposed Buckingham County Compressor Station

To Whom It May Concern:

1. I am requesting a 30 day extension of the comment period due to inadequate public comment period.
2. DEQ should immediately complete a Quantified Risk Assessment (QRA) prior to permitting.
3. DEQ and other state agencies should conduct a Health Risk Assessment (HRA) and a Comprehensive Health Impact Assessment (CHIA).
4. Information provided by individuals possessing technical expertise and credentials who are NOT employed by the DEQ or the developer has not been accepted as expert evidence and adequately considered as part of the technical review. Please address this shortcoming.
5. The air permit treatment of particulate matter (PM) has not been adequately addressed. The potential effects of this pollutant on public health should be considered.
6. Dominion claims to be using the Best Available Control Technology (BACT) but there are available technologies to scrub PM from air emissions. Why are these technologies not being incorporated at this site?

Please address these comments as you consider this controversial air pollution control permit.

Sincerely,

Christopher Sonne, P.E.
Priscilla Sonne



Air Division 1, rr <airdivision1@deq.virginia.gov>

compressor station

1 message

Nancy Sorrells <lotswife@comcast.net>
To: airdivision1@deq.virginia.gov

Thu, Sep 20, 2018 at 9:19 PM

Sept. 20, 2018

From:

Nancy Sorrells

Co-chair, Augusta County Alliance

[3419 Cold Springs Rd.](#)[Greenville, VA 24440](#)lotswife@comcast.net

540-292-4170

Comments in regard to the Buckingham Compressor station air quality permit.

This draft permit should be withdrawn as it does not meet the standards set out by state law. DEQ should not only withdraw the permit but should then do its due diligence and complete a community assessment to thoroughly understand the environmental justice issues and health issues that surround this air quality permit.

It is impossible to separate the air pollution issues from the environmental justice and health issues of this historic, predominantly African-American community. There is a reason that this compressor station is being proposed where it is - because historically speaking communities such as this do not have the financial means to fight this injustice. If this was located in an elite neighborhood, the permitting process never would have gotten this far because of the amount of money that would have been directed toward litigation.

However, it is a documented fact that this compressor station would be a MAJOR source of greenhouse gas emissions. Further, the BACT analysis does not adequately consider the nitrogen oxide emissions and does not monitor a number of other things including fugitive emissions. In addition, the NAAQS modeling is flawed. Nearby communities will suffer health consequences because of exposure to methane. These are but a few of the well-documented flaws and issues associated with the draft air quality permit. The problems have been outlined in excruciating detail by other individuals and groups.

Thus the bottom line is this: The draft permit is too flawed to move forward. There are too many risks to the health of communities and our environment. DEQ should withdraw the permit draft and go back to Dominion for more detailed information regarding nearby human health, environmental justice, and environmental concerns.

thanks so much.

Sincerely,

Nancy Sorrells

**Deny the Buckingham Compressor Station air permit**

1 message

Dory Suttmiller <dorysuttmiller@gmail.com>

Thu, Sep 20, 2018 at 1:15 PM

Reply-To: dorysuttmiller@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

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We ask that you deny this permit and request that the following concerns be addressed:

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It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Dory Suttmiller

Dory Suttmiller
325 Flax Mill Way
Chesapeake, VA 23322
7576202631



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Support

1 message

Gloria Tolbert <tolbertx4@aol.com>
To: airdivision1@deq.virginia.gov

Thu, Sep 20, 2018 at 5:53 PM

September 20, 2018

Virginia Department of Environmental Quality

Piedmont Regional Office

[4949-A Cox Road](#)

[Glen Allen, VA 23060](#)

RE: Buckingham Compressor Station

Dear Department of Environmental Quality:

Thank you for the opportunity to offer my comments on the draft air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station. As a resident of the Commonwealth, I have strongly backed the pipeline and believe it is one of the foundations of a more secure and reliable energy future for Virginia. However, I could not support the project if I believed that the pipeline or any of its associated facilities, including the compressor station, would harm our state's environment. Fortunately I have no such concerns. I am confident in the project developers' commitment to protecting our natural resources and I am equally confident in DEQ's ability to oversee and regulate the ACP's environmental aspects. Your draft air quality permit for the Buckingham Compressor Station provides me with even more confidence in the project.

I am very impressed by the emissions limits and control technology incorporated in the draft permit. Although the station is classified as a "minor" source, the permit requirements are similar to those typically imposed on facilities with much higher levels of emissions. In fact, I understand that the limits imposed by the draft permit are four to 10 times more stringent than the limits in other recently issued for compressor stations in the Commonwealth. This is the case for a variety of regulated emissions, including nitrogen oxides, carbon monoxide and volatile organic compounds.

The technology requirements incorporated in the draft permit are equally impressive. These requirements include selective catalytic reduction for controlling emissions of nitrogen oxides and systems to reduce the venting of natural gas into the atmosphere. Here again, I believe the standards imposed on this "minor" source are much more typical of requirements for the operation of larger facilities with higher levels of emissions.

The Department of Environmental Quality has a proven track record, spanning many years, of protecting the Commonwealth's natural resources, including its air quality. You have brought that same level of dedication to the development of the draft air permit for the Buckingham Compressor Station. I believe Virginia must move forward toward a more secure and reliable energy future and that the ACP is a key to that move. But I also believe we must take strong steps to safeguard the environment as we build that more secure future. The draft permit for the compressor station is one of those strong steps, and I commend you for it. Thank you again for the opportunity to present my comments to you.

Sincerely,

Gloria Tolbert

[6279 Wheelers Cove Road](#)

[Shipman, VA 22971](#)

(434)531-5814

Air Division 1, rr <airdivision1@deq.virginia.gov>

Fwd: Air Quality Permit from VDEQ State Air Pollution Board for a proposed Atlantic Coast Pipeline Compressor Station (Buckingham County)

1 message

louise ward <skiuba3@gmail.com>

Thu, Sep 20, 2018 at 11:06 PM

To: airdivision1@deq.virginia.gov, michael.dowd@deq.virginia.gov

----- Forwarded message -----

From: "louise ward" <skiuba3@gmail.com>

Date: Sep 20, 2018 11:00 PM

Subject: Air Quality Permit from VDEQ State Air Pollution Board for a proposed Atlantic Coast Pipeline Compressor Station (Buckingham County)

To: <airdivision1@deq.virginia.gov>Cc: <michael.dowd@deq.virginia.gov>, <patrick.corbitt@deq.virginia.gov>

Dear Sirs

I request that the Air Pollution Control Board extend the comment period on this proposed permit for a further 30 days. A large quantity of material has been released, much of it highly technical, & more time is required for interested parties to review it. (The review is even more difficult in a rural area with limited broadband.)

It appears that there are 3 main issues related to this proposed compressor station:

1) The Atlantic Coast Pipeline is not needed to supply energy to this area (or other parts of Virginia). The vast majority of the gas will be shipped offshore.

2) The proposed compressor station would cause serious air pollution, noise pollution & light pollution. To locate it near a community would "interfere with safety & health", & is not "reasonable". It does not have "social or economic value" & is not "suitable to the area". These quotations refer to Code of Virginia 10.1-130.E, & the questions posed by the Code in points 1, 2, & 3. The proposed siting of the compressor station near a historic African American community indicates that Dominion is violating social & environmental justice principles & taking advantage of disadvantaged people of color.

3) The proposed compressor station would discharge excessive emissions of methane. Not only is that harmful to residents & the immediate environment, but methane is a huge contributor to climate change. Once again Virginia (as well as the Carolinas) has been impacted by a serious weather event, Hurricane Florence, that was made more severe by climate change. (Item 4. of the Code of Virginia refers to the "practicability of reducing or eliminating discharge". Dominion appears to have disregarded this with respect to methane emissions.

All of these issues require much more thorough study by the Air Board, as mandated by the Code of Virginia.

I respectfully request that the Air Board conduct a thorough review of these matters before proceeding further.

Thank you.

Louise Ward



Air Division 1, rr <airdivision1@deq.virginia.gov>

Extend Comment Period for the Buckingham Compressor Air Permit

1 message

Marsha White <mf.white@verizon.net>

Thu, Sep 20, 2018 at 3:59 PM

Reply-To: mf.white@verizon.net

To: airdivision1@deq.virginia.gov

The concept of "tzedek" comes from the Jewish faith tradition, calling for justice and equity among all people. The vision of tzedek is one of environmental justice and clean and safe air for all to breathe. The proposed Atlantic Coast Pipeline (ACP) compressor station violates this concept as it would expose residents in Union Hill and Buckingham County to leaking pollutants such as methane gas, formaldehyde, benzene, arsenic, uranium and additional toxic volatile organic compounds (VOCs).

This 54,000+ horsepower compressor station is one of the largest that Dominion has ever built and the largest in Virginia, further endangering health of residents and increasing risk and vulnerability. Having clean air is a fundamental human right and is especially vital for children and the elderly, some of the most vulnerable to the negative impacts of inhaling pollutants.

Many of the world's major faith traditions have a mandate to care for the Earth. By doing so, we care for each other. I submit this comment with love to express my solidarity with the community of Buckingham and their health and safety concerns stemming from the construction and operation of this massive compressor station.

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to extend the 30-day comment period to at least 60 days, to ensure meaningful participation by impacted populations in permitting and monitoring, and to immediately complete a thorough Quantitative Risk Assessment (QRA) and a Comprehensive Health Impact Assessment (CHIA) prior to any future permitting.

I further urge the VA State Air Pollution Control Board and the DEQ to abide by the principles of environmental justice as the compressor station is proposed to be sited in Buckingham County's historic Union Hill, an 85% African American community. It is unacceptable that our society continues to disproportionately burden the poor and people of color with increased levels of dangerous air pollution.

Being unable to take a deep breath of clean air to pray or meditate at the many nearby religious sites such as Union Hill and Union Grove Churches and the LOTUS Temple, one of the many sacred places in Satchidananda Ashram Yogaville, is an egregious violation of humanity.

The risks to our sacred gift of air posed by Dominion's proposed ACP compressor station are simply too high.

Ms. Marsha White
9016 Triple Ridge Rd
Fairfax Station, VA 22039
7036904384



Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Kacy Workman (kworkman125@gmail.com) Sent You a Personal Message

Thu, Sep 20, 2018 at 5:02

<automail@knowwho.com>

PM

To: airdivision1@deq.virginia.gov

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I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.

- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.

- The draft permit will require mostly self-monitoring by Dominion of air quality and emissions. It does not explain why installing further community monitoring technology is unnecessary to protect air quality and human health.

- A Quantitative Risk Assessment and Comprehensive Health Impact Assessment should be conducted to address the complex and multifaceted ways that the health of residents could be impacted by emissions from the compressor station.

- No mention of how air quality emergencies will impact the community or be mitigated is included in the draft permit.

- While greenhouse gas emissions are briefly mentioned, there is no analysis of how measures established in the draft permit will ensure that air quality and human health will be protected from climate change impacts.

Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Kacy Workman
28 Westhampton Way
Kacy, VA 23173
kworkman125@gmail.com
(443) 454-3003

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Air Division 1, rr <airdivision1@deq.virginia.gov>

Buckingham Compressor Station Air Permit

1 message

Rena Xiao (rena.xiao@richmond.edu) Sent You a Personal Message

Thu, Sep 20, 2018 at 1:43

<automail@knowwho.com>

PM

To: airdivision1@deq.virginia.gov

Dear Ann Regn,

I am extremely disappointed in you Ralph Northam, siding with Dominion and corporate america. I did not spend so much time canvassing and volunteering for you just to have you go back on your word.

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

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For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely,

Rena Xiao
28 Westhampton Way
Richmond, VA 23173
rena.xiao@richmond.edu
(425) 516-8860

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



Air Division 1, rr <airdivision1@deq.virginia.gov>

Virginia Department of Environmental Quality

1 message

Michel Zajur <ZAJUR@vahcc.com>
To: airdivision1@deq.virginia.gov

Thu, Sep 20, 2018 at 10:04 AM

Virginia Department of Environmental Quality,

On behalf of the Virginia Hispanic Chamber I would like to submit the attached letter to the water control board?

Thank you Michel

Michel Zajur
President/CEO
Virginia Hispanic Chamber of Commerce
Cell. 804-306-4404
WWW.VAHCC.COM

The information in this communication is intended to be confidential to the Individual(s) and/or Entity to whom it is addressed. It may contain information of a Privileged and/or Confidential nature, which is subject to Federal and/or State privacy regulations. In the event that you are not the intended recipient or the agent of the intended recipient, do not copy or use the information contained within this communication, or allow it to be read, copied or utilized in any manner, by any other person(s). Should this communication be received in error, please notify the sender immediately either by response e-mail or by phone, and permanently delete the original e-mail, attachment(s), and any copies.

**Virginia Department of Environmental Quality.pdf**

2216K



THE VIRGINIA HISPANIC
CHAMBER *of* COMMERCE

Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

RE: Buckingham Compressor Station

Dear Department of Environmental Quality:

On behalf of the Virginia Hispanic Chamber, I appreciate this opportunity to submit our comments on the draft air quality permit for the Buckingham Compressor Station. As you know, the station is an integral part of the Atlantic Coast Pipeline, and the Virginia Hispanic Chamber, along with many other members of the Commonwealth's business community, have strongly supported the project. We believe our state's continued economic health and growth depends upon a secure, reliable and affordable supply of energy. The pipeline is a key to achieving that goal.

However, the Virginia Hispanic Chamber could not support the project, no matter how attractive it might be from an energy standpoint, if we felt it had the potential to damage Virginia's environment. Fortunately, we have no such concerns. We are impressed by the developers' commitment to protecting our natural resources. We are equally impressed with the thoroughness and dedication your department has brought to reviewing the ACP's environmental impacts and your willingness to take strong steps to ensure those impacts are held to an absolute minimum. You have shown that same dedication in developing the draft air permit.

We are very pleased with the strict emissions limits included in the draft. Although the station is classified under federal and state regulations as a "minor" source of emissions, we are told that the limits included in the draft permit are much more typical of those

imposed on larger facilities with much higher emissions levels. In fact, we understand that the limits in the draft Buckingham permit are four to 10 times stricter than the limits in any other permit recently issued for compressor stations in Virginia. These stringent limits apply to regulated emissions ranging from nitrogen oxides to volatile organic compounds to carbon monoxide, and they will help ensure that Virginia's air remains clean and healthy even as we expand our energy infrastructure.

Additionally, we are impressed by the control technology required by the draft permit. Here again, these controls are more typical of those mandated for much larger facilities with higher levels of emissions. The systems included in the draft permit cover an impressive range from selective catalytic reduction to as vent gas recovery system designed to minimize the release of natural gas into the atmosphere. We are confident that the developers will carry out the permit's strong requirements for air quality protection.

The Department of Environmental Quality has worked hard for many years to ensure that future generations of Virginians will have clean water and air. We applaud you for continuing that work through the terms and conditions in the draft Buckingham air permit. And the Virginia Hispanic Chamber again thanks you for the opportunity to offer our comments on this important regulatory matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michel Zajur' with a stylized flourish at the end.

Michel Zajur
President/CEO
Virginia Hispanic Chamber of Commerce
Cell. 804-306-4404